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February 26, 2004

Mr. Henry Walker  
Boult, Cummings, Conners & Berry, PLC  
PO Box 198062  
414 Union Street, Suite 1600  
Nashville, TN 37219


Re: *Implementation of the Federal Communications Commission's  
Triennial Review Order - Nine-Month Proceeding - Switching  
Docket No. 03-00491*

Dear Mr. Walker:

Enclosed are the Responses of Sprint to AT&T's First Set of Interrogatories and Requests for Production of Documents issued in the above proceeding. Please note the Responses contain confidential information and are provided pursuant to the protective order entered in this case.

Should you have any questions, please contact me.

Sincerely,

  
James B. Wright

Enclosure

cc: → Chairman Deborah Taylor Tate (14 copies)  
Interested Parties Counsel of Record (one copy)  
Laura Sykora  
Kaye Odum

**CERTIFICATE OF SERVICE**  
**Docket No. 03-00491 Mass Market Switching**

I hereby certify that on February 25, 2004, a copy of the Responses of Sprint to AT&T's first set of discovery was served on the following parties of record by air express, by electronic service or via United States mail, postage paid and addressed to the following:

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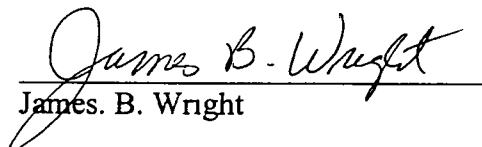
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James. B. Wright

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

In Re:

FCC's Triennial Review Order (Nine Month  
Proceeding) (Switching)

Docket No. 03-00491

**SPRINT'S RESPONSES AND OBJECTIONS TO  
AT&T'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

COMES NOW Sprint Communications Company L.P., United Telephone-Southeast, Inc. ("Sprint United") and Sprint Spectrum d/b/a Sprint PCS (collectively "Sprint") and respectfully submits the following Responses and Objections to the First Set of Interrogatories and First Requests for Production of Documents served on Sprint by AT&T Communications of the South Central States, LLC. ("AT&T") on February 20, 2004, in the above-referenced docket.

**GENERAL OBJECTIONS**

1.

. These responses are being provided by Sprint as a party to these proceedings and as a carrier certified to provide telecommunications services in Tennessee. To the extent that AT&T's Interrogatories and Requests seek to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this

docket, Sprint objects on the grounds that such requests are irrelevant, overly burdensome, oppressive and not permitted by the applicable discovery rules.

2.

Sprint objects to each and every one of these Interrogatories and Requests to the extent that they request information which is exempt from discovery by virtue of the work product doctrine, attorney-client privilege, or other applicable privilege.

3.

Sprint objects to these Interrogatories and Requests to the extent that they seek information that is not relevant to any issue in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence.

4.

Sprint objects to AT&T's Interrogatories and Requests to the extent that they seek to impose obligations on Sprint that exceed the requirements of the Tennessee Rules of Civil Procedure or other applicable Tennessee law or Authority regulation.

5.

To the extent that AT&T's Interrogatories and Requests seek trade secrets, confidential research, development or commercial information or other confidential or proprietary information, Sprint objects. Subject to any other applicable objections, Sprint will provide such information in accordance with any Protective Order issued in this docket.

6.

Sprint objects to AT&T's Interrogatories and Requests to the extent that they are vague, ambiguous, overly broad, and imprecise, or to the extent that they utilize unexplained or insufficiently defined terms or phrases, or are unnecessarily duplicative.

7.

Sprint is a large corporation with employees located in many different locations across the United States. In the course of conducting business on a nationwide basis, Sprint creates numerous documents that are not subject to either Authority or FCC record retention requirements. These documents are kept in numerous locations and frequently are moved from location to location as Sprint employees change jobs, or as Sprint's business objectives changes. Accordingly, it is possible that not every document has been identified in response to these Interrogatories and Requests. Sprint will conduct a reasonable and diligent search of those files that are reasonably expected to contain the requests documents or information. To the extent that AT&T's Interrogatories and Requests seek to require more, Sprint objects on the grounds that compliance would be unduly burdensome, expensive and extremely time consuming.

8.

Sprint objects to AT&T's Interrogatories and Requests to the extent that they require the production of documents or information that is in the public domain, or on

record with the Authority or the Federal Communications Commission, or which is already in AT&T's possession, custody or control.

9.

Sprint objects to each and every one of these Interrogatories and Requests to the extent that they seek to have Sprint create documents or information not in existence at the time of the discovery request.

### **RESPONSES AND OBJECTIONS TO AT&T'S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

**Interrogatory No. 1.** What costs, in terms of time, labor and materials, does Sprint incur when installing and maintaining a DS1 channel bank in Tennessee?

**Objections:** See General Objections 1, 5 and 6. Sprint considers the information responsive to this request to be proprietary. Sprint believes that the requests for production of documents are unnecessarily duplicative in that they are identical to the interrogatories. In addition, Sprint objects specifically to this question in that it seeks information for the installation of channel banks for Sprint, which activity is performed in Tennessee only by Sprint United.

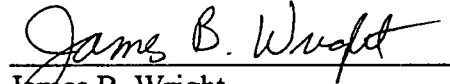
**Response:** Subject to, and without waving, the foregoing objections, Sprint responds as follows: Please see attached Exhibit A titled "Tennessee Customer Premises Channel Bank Investments". Pursuant to agreement of counsel for AT&T, information is provided only for Sprint United. The sales tax is specific to Tennessee. The charge factor in column F8 is specific to Sprint's ILEC operations in Tennessee. This information is being provided pursuant to the Protective Order issued in this case.

**Interrogatory No. 2.** Are the costs identified in response to question number 1 appropriate for used in calculating the cross-over point at which a multiple DS0 line customer would more economically be served by a DS1?

**Objections:** See General Objection 6. Sprint believes that the requests for production of documents are unnecessarily duplicative in that they are identical to the interrogatories.

**Response:** Without waving the foregoing objections, Sprint responds as follows: Yes. The costs included in response to question number 1 are appropriate for use in calculating the crossover point at which a multiple DS0 line customer would be more economically served by a DS1. Pursuant to agreement of counsel for AT&T, information is provided only for Sprint United.

Respectfully submitted this 26th day of February, 2004.



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Sprint

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Attorney for Sprint

## Exhibit A

Tennessee  
Customer Premises Channel Bank Investments

A	B	C	D	E	F
Row	Description	Material	Sales Tax	Total Investment	Cost
8	Factors		109 5%		30.45%
9					
10	Channel Bank				
11	Adtran 750 Chassis	\$ 193.30	\$ 211.66	\$ 211.66	
12	Power Supply Unit	\$ 186 52	\$ 204 24	\$ 204.24	
13	Bank Controller Unit	\$ 193.30	\$ 211.66	\$ 211.66	
14	AC Supply & Charger	\$ 153 73	\$ 168.33	\$ 168.33	
15	Battery Backup	\$ 271.30	\$ 297.07	\$ 297.07	
16	Battery Mounting Brackets	\$ 47.48	\$ 51.99	\$ 51.99	
17	Channel Bank			\$ 1,144.96	\$29.05
18					
19	VG Cards (Quad FXS cards)	\$ 142.43	\$ 155.96	\$ 155.96	\$3.96
20	Cards Needed	6		\$ 935.77	\$23.75
21					
22	<b>Total Channel Bank with Cards</b>			\$ 2,080.73	\$52 80
23					
24					
25	<b>Installation</b>				
26	<b>Channel Bank</b>	<b>Hours</b>	<b>Labor Rate</b>	<b>Labor Cost</b>	<b>Total Labor Cost</b>
27	Installation of Channel Bank	5	\$ 47.41	\$ 237.05	
28	Engineering of Channel Bank	3	\$ 55 80	\$ 167 40	
29	Total Labor				\$ 404.45
30					
31	<b>Inside Wire Connection</b>				
32	Travel for Service Connection	0.75	\$ 47.41	\$ 35.56	
33	Connect 24 jumpers from termination block to inside wire	1	\$ 47 41	\$ 47.41	\$ 82.97
34					
35	Travel for Service Disconnection	0.75	\$ 47 41	\$ 35.56	
36	Disconnect 24 jumpers from termination block to inside wire	0 5	\$ 47 41	\$ 23.71	\$ 59.26
37					
38	<b>Total Labor at Customer Premises</b>				<b>\$ 546.68</b>